FILED
AUG 25 2016
U. S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
v.	)	
	)	**No.** 4:16CR381 RWS/PLC
DARNE E. WASHINGTON,	)	
	)	
Defendant.	)	
	)	

INDICTMENT

THE GRAND JURY CHARGES:

COUNT ONE

[Unlawful Production of a False Identification Document]

On or about December 1, 2015, in the Eastern District of Missouri, the defendant,

DARNE E. WASHINGTON,

did knowingly and without lawful authority produce a false identification document, to wit, a social security card bearing the name of an individual with the initials L.M. and social security number xxx-xx-0138, and the false identification document appears to have been issued by or under the authority of the United States, all in violation of Title 18, United States Code, Section 1028 (a)(1) and (b)(1)(A)(i).

FORFEITURE ALLEGATION

The Grand Jury further finds by probable cause that:

1. Pursuant to Title 18, United States Code, Section 982 (a)(2)(B) and 1028 (b)(5), upon conviction of an offense in violation of Title 18, United States Code, Section 1028 (a)(1) as set forth in Count One of this Indictment, the defendant, **DARNE E.**

WASHINGTON, shall forfeit to the United States of America any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of such violation(s) and any personal property used or intended to be used to commit the offense. The property to be forfeited includes, but is not limited to, any counterfeit social security cards.

2. Subject to forfeiture is a sum of money equal to the value of the property constituting, or derived from proceeds the defendant obtained directly or indirectly as a result of such violation.

3. If any of the property described above, as a result of any act or omission of the defendant:

a. cannot be located upon the exercise of due diligence;

b. has been transferred or sold to, or deposited with, a third party;

c. has been placed beyond the jurisdiction of the court;

d. has been substantially diminished in value; or

e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

Dated: ____________________

A TRUE BILL

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FOREPERSON

RICHARD G. CALLAHAN
United States Attorney

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Gilbert C. Sison
Assistant United States Attorney